



April 22, 2025

The Honorable Valerie Figueredo  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *In re DiDi Global Inc. Secs. Litig., No. 1:21-cv-05807***

Dear Judge Figueredo:

We represent Lead Plaintiff Alaka Holdings Ltd., and named plaintiffs Shereen El-Nahas, Daniil Alimov, Bosco Wang, and Njal Larson (collectively, “Plaintiffs”), in the above-referenced matter. Pursuant to the Confidentiality Stipulation and Protective Order, entered on May 22, 2024 (ECF 190), SDNY Local ECF Rule 6.8, and Your Honor’s Individual Practices in Civil Cases, we write to request permission to: (1) file Plaintiffs’ Amended Reply in Further Support of Motion for Class Certification with redactions; and (2) file under seal the supporting Amended Declaration of Dr. Rajesh Aggarwal (“Amended Aggarwal Decl.”).

First, Plaintiffs informed counsel for Defendant Goldman Sachs (“GS”) that Plaintiffs intend to file materials obtained in discovery that GS has designated “ATTORNEYS’ EYES ONLY” under the Protective Order and reference those materials in their brief. Absent a consent of the designating party or a contrary Order from this Court, the Protective Order requires Plaintiffs to file the above-referenced documents under seal. ECF 190, at ¶14 (“Absent the consent of the producing party under this Section or order of the Court, the receiving party shall file the Confidential or Attorney’s Eyes Only Information under seal.”) GS has designated the materials at issue “ATTORNEYS’ EYES ONLY” pursuant to the Protective Order. GS requested that Plaintiffs file these materials, and references thereto, under seal. These materials are referenced in the Amended Aggarwal Decl. and the body of the brief.

Second, Plaintiffs request that excerpts of the deposition of Lead Plaintiff Alaka Holdings Ltd., attached as Exhibit 4 to the Rosen Decl., be filed under seal, and that excerpts quoted in the brief be publicly redacted. Lead Plaintiff has designated the transcript as confidential pursuant to ¶14 of the Protective Order.

Plaintiffs are publicly filing a redacted version of their Reply in Further Support of Motion for Class Certification with placeholder exhibits and electronically filing under seal a copy of the

Reply with unredacted exhibits. The Appendix below lists the parties and their counsel of record who should have access to the sealed documents.

Dated: April 22, 2025

Respectfully submitted,

/s/ Laurence Rosen

Laurence Rosen

cc: All counsel of record via ECF

**MEMO ENDORSED**



**HON. VALERIE FIGUEREDO  
UNITED STATES MAGISTRATE JUDGE**

Dated: 4/23/2025

If Defendant Goldman Sachs seeks to permanently seal the materials discussed herein, it is directed to make a showing under Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 110 (2d Cir. 2006) by **May 30, 2025**. To permanently seal the deposition excerpts, Plaintiffs are directed to make a showing under Lugosch, 435 F.3d 110, by **May 30, 2025**.